

Robert B. Sykes (#3180)  
Rachel L. Sykes (#11778)  
SYKES McALLISTER LAW OFFICES, PLLC  
311 S. State Street, Suite 240  
Salt Lake City, Utah 84111  
Telephone No. (801) 533-0222  
[bob@sykesmcallisterlaw.com](mailto:bob@sykesmcallisterlaw.com)  
[rachel@sykesmcallisterlaw.com](mailto:rachel@sykesmcallisterlaw.com)  
*Former Counsel for Susan Hunt*

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION

---

SUSAN HUNT, mother and personal  
representative of DARRIEN HUNT,  
deceased; CURTIS HUNT; and  
ESTATE OF DARRIEN HUNT, by its  
Personal Representative Susan Hunt,

Plaintiffs,

vs.

MATTHEW L. SCHAUERHAMER;  
NICHOLAS E. JUDSON; and the  
CITY OF SARATOGA SPRINGS,  
UTAH,

Defendants.

---

NOTICE OF  
ATTORNEY'S LIEN

Civil No. 2:15-cv-00001-TC

Judge Tena Campbell

---

STATE OF UTAH )  
 ) ss.  
County of Salt Lake )

Pursuant to Utah Code Ann. § 38-2-7 (2001), Robert B. Sykes, Rachel L. Sykes, and the firm of Sykes McAllister Law Offices, PLLC ("Sykes") hereby assert an attorney's lien on this matter as follows:

1. The name, address and telephone number of the attorney claimants is set forth in the pleading heading above, and is incorporated herein by reference.

2. The names of the clients are Susan Hunt, residing at 329 Harvest Moon Drive, Saratoga Springs, Utah 84045, and the Estate of Darrien Hunt, by its Personal Representative Susan Hunt.

3. The Sykes fee subject to this lien was agreed to in a written Retainer Agreement executed by the parties on 9/25/14, which provided for a lien on "40% of any settlement offer received by Firm" and a lien for "costs."

4. The "settlement offer" or property which is the subject of this lien is a contingent fee on a § 1983 case, plus costs, incurred prior to being dismissed by Susan Hunt. This fee is the subject of, and connected with, work in obtaining a \$900,000 settlement offer in the case identified in the caption.

5. Attorney Sykes received from Heather White, counsel for the defendants, a \$900,000 offer of settlement for the client. After consulting with Susan Hunt, Attorney Robert Sykes contacted Defendants' attorney, Heather White, and accepted this offer on behalf of Susan Hunt. Curtis Hunt also accepted the settlement offer of \$900,000. Susan has not signed the final settlement documents.

6. Susan Hunt has agreed to a binding arbitration on the split of the settlement with Curtis Hunt, if the two could not otherwise agree on a split. Susan

Hunt's share of the \$900,000 offer would have been 60-70% of the \$900,000, or \$540,000-\$630,000.


7. This 40% contingent fee to the attorney claimants was to be calculated on the portion Mrs. Hunt received from the entire settlement. If Susan Hunt were awarded 70% of the \$900,000, the Claimants' fee would be **\$252,000**. If she were awarded 65% of the gross settlement, the Claimants' fee would be **\$234,000**. If Susan Hunt were awarded 60% of the settlement, the Claimants' fee would be **\$216,000**. In other words, this lien is for 40% of Susan Hunt's share of the \$900,000 offer.

8. The costs for which payment is herein demanded amount to the sum of **\$7,590**.

9. The first work on this case was performed on or about September 25, 2014. After that date, work was performed by other attorneys employed in this firm. To date, 311.6 hours have been put into this case by the Claimants' law firm, together with the \$7,590.00 in costs.

10. In summary, this lien is for a fee on Susan Hunt's share of any payment, settlement or judgment resulting from Darrien Hunt's injuries, suffering and death, at 40% of Susan Hunt's share of the \$900,000 settlement, as set forth above.

DATED this 18<sup>th</sup> day of September, 2015.

  
ROBERT B. SYKES  
Attorney and Lien Claimant

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Notice of Attorney Lien** was served upon all parties of record, as listed below, on this 18<sup>th</sup> day of September, 2015:

**Plaintiffs Susan Hunt and Estate of Darrien Hunt:** [by email, regular mail, and certified mail]  
Susan Hunt  
329 Harvest Moon Drive  
Saratoga Springs, Utah 84045

**Counsel for Plaintiffs Susan Hunt and Estate of Darrien Hunt Susan Hunt:** [by efilng]  
Paul Lydolph III  
LYDOLPH & WEIERHOLT  
[paul@lydolphlaw.com](mailto:paul@lydolphlaw.com)

**Plaintiff Curtis Hunt's Attorney:** [by efilng]  
Karra J. Porter  
Scott T. Evans  
CHRISTENSEN & JENSEN, P.C.  
[karra.porter@chrisjen.com](mailto:karra.porter@chrisjen.com)  
[scott.evans@chrisjen.com](mailto:scott.evans@chrisjen.com)

**Defense Counsel:** [by efilng]  
Heather S. White  
[hsw@scmlaw.com](mailto:hsw@scmlaw.com)

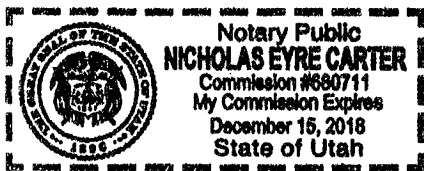
/s/ Robert B. Sykes \_\_\_\_\_

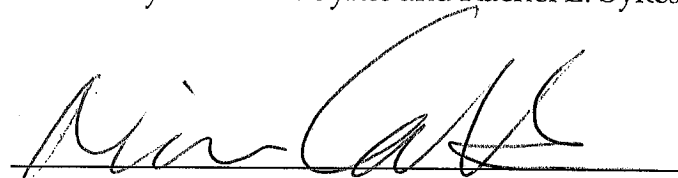
150917, Notice of Atty Lien.wpd

DATED this 18<sup>th</sup> day of September, 2015

  
RACHEL L. SYKES  
Attorney and Lien Claimant

Subscribed and sworn to before me by Robert B. Sykes and Rachel L. Sykes  
this 18<sup>th</sup> day of September, 2015.



  
Notary Public in and for the State of Utah